

**IN THE CIRCUIT COURT OF MARYLAND
FOR PRINCE GEORGE'S COUNTY**

NEHEMIAS MEJIA
4506 East West Highway
Riverdale, Maryland 20737

Plaintiff

v.

Case No.:

\ **NBCUNIVERSAL MEDIA, LLC**
30 Rockefeller Plaza
New York, New York 10112

SERVE: Resident Agent
The Corporation Trust, Inc.
2405 York Road
Suite 201
Timonium, Maryland 21093

and

\ **TELEMUNDO GROUP LLC**
SERVE: Resident Agent
Enterprise Corporate Services, LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

\ **TELEMUNDO MEDIA LLC**
SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

\ **TELEMUNDO MID-ATLANTIC LLC**
SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

PR GEORGE CO MD #31

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Clerk of the
Circuit Court

✓ **TELEMUNDO NETWORK GROUP LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

and

✓ **TELEMUNDO TELEVISION STUDIOS, LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, Delaware 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERPRISES LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERPRISES PRODUCTIONS LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

✓ **NBCUNIVERSAL DIGITAL ENTERTAINMENT LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL DIGITAL LAB LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL ENTERPRISE, INC.**

SERVE: Resident Agent
Comcast Capital Corporation
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL INTERNATIONAL NETWORKS US LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL NETWORKS INTERNATIONAL LATIN AMERICA LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

\ **NBCUNIVERSAL NETWORKS INTERNATIONAL SPANISH LATIN AMERICA LLC**

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL PRODUCTION SERVICES LLC

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL SHARED SERVICES LLC

SERVE: Resident Agent
Enterprise Corporate Services LLC
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

And

NBCUNIVERSAL, LLC

SERVE: Resident Agent
Comcast Capital Corporation
1201 N. Market Street, Suite 1000
Wilmington, DE 19801

Defendants

COMPLAINT - DEFAMATION

Comes now the Plaintiff, Nehemias Mejia, by and through his attorneys Jonathan R. Oates and Krum, Gergely & Oates, LLC, and Jonathan Carroll and Jezic & Moyse, LLC, hereby brings this cause of action against all Defendants named above, and in support thereof states as follows:

1. Plaintiff, Nehemias Mejia, is an adult and at all times relevant hereto a resident of Prince George's County.

2. At all times relevant hereto, Defendants owned and operated Telemundo 44, a local television station broadcasting in Prince George's County, Maryland under the call sign WZDC.

3. Defendant NBCUniversal Media, LLC, is incorporated in the State of Maryland and maintains a major place of business within the State of Maryland.

4. Defendants Telemundo Group LLC, Telemundo Media LLC, Telemundo Mid-Atlantic LLC, Telemundo Network Group LLC and Telemundo Television Studios, LLC, are foreign entities incorporate in the State of Delaware.

5. Defendants, acting jointly and severally:

- a. Transact business and performs service in the State of Maryland;
- b. Contracts to supply services in the State of Maryland;
- c. Caused tortious injury to Plaintiff in the State of Maryland by an act within the State of Maryland.

6. The cause of action hereinafter alleged by the Plaintiff took place by Defendants in the State of Maryland.

7. On June 8, 2018, Plaintiff was arrested for various offenses in Arlington County, Virginia. None of those offenses included any form of sexual assault.

8. On June 11, 2018, Defendants broadcast a television news story on the evening news through their agent, Telemundo 44 WZDC, claiming that the Plaintiff had been arrested in Prince George's County for sexual assault. That broadcast depicted a screen-sized photo of the Plaintiff's face with a caption that indicated he had been charged with sexual assault.

9. The information contained in Defendants' broadcast regarding the Plaintiff was false.

10. Defendants negligently broadcast the aforementioned false and defamatory statement about Plaintiff.

11. Defendants published this false and defamatory publication to potentially tens of thousands of viewers watching the news broadcast at that time.

12. This broadcast statement was defamatory in tending to injure Plaintiff in his profession and employment, and further, impugning him to be sexually aggressive and a sexual predator to others.

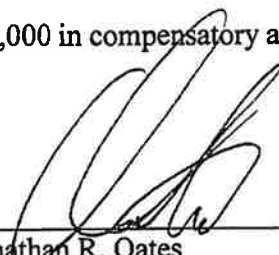
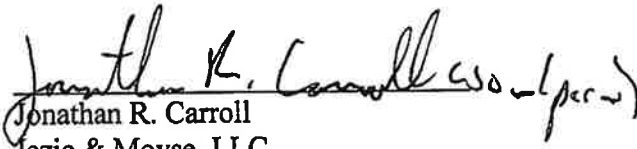
13. Members of the public viewed the false information about the Plaintiff in the broadcast and took it to be true. Plaintiff's supervisor at his job viewed the broadcast and believed that Plaintiff had been charged with sexual assault. As a result, the Plaintiff was terminated.

14. Despite learning about the falsity of the broadcast statement, Defendants have not corrected the record by retracting or correcting the false and defamatory statement.

15. As a direct and proximate cause of the false and defamatory statements published by Defendants, the character and reputation Plaintiff were harmed, his standing and reputation in the community was harmed, and he suffered mental anguish and personal humiliation.

16. As of the false and defamatory broadcast published by Defendants, Plaintiff was terminated from his employment and suffered loss of income.


WHEREFORE, Plaintiff, Nehemias Mejia, demands judgement of and from all Defendants jointly and severally in a sum to exceed \$75,000 in compensatory and punitive damages, plus interest and costs.


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Attorneys for Plaintiff

PRAYER FOR JURY TRIAL

Plaintiff prays a trial by jury on all issues triable thereby.


Jonathan R. Oates
Jonathan R. Carroll

Attorneys for Plaintiff